

1. Plaintiff requests that this Court order defendant Freeman Health System be dismissed with prejudice from the above cause of action pursuant to Federal Rule of Civil Procedure 41(a)(2).
2. Attorneys for plaintiff and this defendant have negotiated a settlement to end the litigation between these parties. Plaintiff and defendant have agreed to the terms of the settlement which are confidential. These parties and their attorneys have agreed and do not object to dismissal of this defendant with prejudice.
3. The request for dismissal is made pursuant to settlement and will not result in a waste of judicial time and effort and does not prejudice any party, nor is it sought to escape an adverse decision or seek a more favorable form. Plaintiff has now settled all of his claims against the healthcare defendants to this case and seeks to dismiss all claims against them with prejudice.

WHEREFORE, for the foregoing reasons, plaintiff prays this Court for its Order dismissing defendant Freeman Health System, with prejudice, and for such further and additional relief as the Court deems just and proper in the premises.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 7, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following:

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*Attorney for Defendant Freeman Health System*

And I hereby certify that I have mailed by United States Postal Service the document to the following non CM/ECF participants:

None.

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/s/ Patrick R. Baird

Patrick R. Baird